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9 *Attorney for Defendant Dr. Yong Shinn*

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 UNITED STATES,

13 PLAINTIFF,

14 VS.

15 YONG P. SHINN,

16 DEFENDANT.

) Case No.: CR-09-00597-JF

) STIPULATION AND ~~PROPOSED~~
) ORDER TO CONTINUE SENTENCING
) HEARING

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20 The United States, through its counsel Jeffrey Nedrow, and defendant Yong P.
21 Shinn, through his counsel, Miles Ehrlich, hereby agree and stipulate to a continuance of
22 the sentencing hearing in this case now scheduled for July 22, 2010 to a new date of
23 September 2, 2010 at 9:00 a.m.

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25 The parties agree that the following reasons exist for this continuance:

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28 STIPULATION AND ORDER TO CONTINUE SENTENCING HEARING, *U.S. v. YONG P. SHINN*, CR-09-00597-JF

1 The defense and the government have been attempting to resolve a complex legal issue
 2 concerning the proper calculation of loss in this case, in order to avoid the need for a
 3 evidentiary hearing before sentencing in the case. The Probation Office has now
 4 reviewed the extensive submissions provided by the parties and has provided the draft
 5 Presentence Report. The parties now require the full 35 days to prepare their responses
 6 and objections to the draft PSR, and then to submit their respective sentencing
 7 memoranda.
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10 Accordingly, the parties agree and respectfully request that the currently scheduled
 11 sentencing hearing be vacated and that sentencing be scheduled for 9:00 a.m. on
 12 September 2, 2010. The Probation Officer has been informed of, and concurs, in this
 13 requested continuance.
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15 Respectfully submitted,

16 Dated: July 16, 2010

17 /s/
 18 MILES EHRLICH
 19 Counsel for Yong P. Shinn

20 Dated: July 16, 2010

21 /s/
 22 JEFFREY D. NEDROW
 23 Assistant United States Attorney

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27 STIPULATION AND ORDER TO CONTINUE SENTENCING HEARING, *U.S. v. YONG P. SHINN*, CR-09-00597-JF
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~~[PROPOSED]~~ ORDER

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED THAT:

The currently scheduled July 22, 2010 sentencing hearing is hereby vacated and a new sentencing hearing is hereby scheduled for 9:00 a.m. on September 2, 2010.

DATED: 7-21-10


HONORABLE JEREMY FOGEL